

Comments related to: CG RM-11829

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From: Glenn B Schulz, W9IQ

I oppose the request for rule making on the basis that it is an extensive duplication of GMRS services and it places non-certified transmitters in the hands of potentially technically inept individuals.

#### Duplication of Services

The purpose, licensing method, and privileges proposed in RM-11829 are largely a duplicate of the licensing method, frequency range, power limitations, and repeater infrastructure already permitted for GMRS licensees.

Agencies such as CERT are freely able to make use of GMRS services and licensees as this type of activity is clearly permitted:

*§95.1703 Definitions, GMRS.*

*General Mobile Radio Service (GMRS). A mobile two-way voice communication service, with limited data applications, for facilitating activities of individual licensees and their family members, including, but not limited to, voluntary provision of assistance to the public during emergencies and natural disasters.*

#### Non-Certified Transmitters

The petitioner proposes that the licensing method for the Tyro class of license be an on-line license application with test questions about “radio etiquette and usage rules”. Yet the Amateur Radio service benefits from the use of non-certified transmitters on the basis that the licensed operator has sufficient technical knowledge so as to ensure compliance with the regulations with regard to power, bandwidth, and spectral purity. Other FCC regulated radio services that require only knowledge of “usage rules” require certified transmitters to force compliance in these matters.

With this request for rule making, we will be placing non-certified transmitters in the hands of potentially technically inept operators. Clearly this proposal runs contrary to the certification architecture set forth by the FCC to ensure clean airwaves and useful services.

Respectfully Submitted,

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